

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

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LITIGATION

Civil No. 18-cv-01776 (JRT/JFD)
Civil No. 21-cv-02998 (JRT/JFD)

This Document Relates to:
MDL DAP Actions

**STIPULATION TO AMEND THE COURT'S PRETRIAL
CASE MANAGEMENT AND SCHEDULING ORDER
WITH RESPECT TO MDL DAPS' CONSOLIDATED COMPLAINT**

The undersigned parties (“Parties”) stipulate and hereby request that the Court extend the deadlines related to the MDL Direct-Action Plaintiffs’ (“MDL DAPs”) forthcoming consolidated complaint.

1. The Court’s Pretrial Case Management and Scheduling Order (“Pretrial Scheduling Order”) (ECF No. 1525) ordered MDL DAPs to file a single consolidated complaint within 30 days from entry of the Pretrial Scheduling Order, by November 3. Defendants were ordered to answer or otherwise respond within 30 days from the filing of that consolidated complaint. The Pretrial Scheduling Order further ordered the parties to file a proposed order (1) governing the process by which any future MDL DAP shall join the consolidated complaint, including a proposed short-form complaint if appropriate, and (2) governing the process by which Defendants shall answer or otherwise respond to complaints filed by any future MDL DAPs (or by which their prior answer to the consolidated complaint shall apply to complaints filed by any future MDL DAPs) (the “Proposed Order”).

2. The Parties have conferred, and respectfully request to extend the deadlines for MDL DAPs to file a single consolidated complaint to December 5, 2022 and for each Defendant family to answer or otherwise respond to January 20, 2023. The Parties further respectfully request to extend the deadline to file the Proposed Order to December 12, 2022.

3. Good cause exists for these extensions because of the complexity involved in consolidating approximately thirty complaints into a single complaint and because of the substantial work involved in answering or otherwise responding to a complaint with the length and detail the consolidated complaint is expected to have, as well as the intervening holidays.

Dated: October 25, 2022

Respectfully submitted,

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